

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION

JON BATTS,

Plaintiff,

v.

REMINGTON ARMS COMPANY, LLC,

Defendant.

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CIVIL ACTION NO. 6:17-CV-00346-ADA
[JURY DEMANDED]

MOTION TO WITHDRAW AS PLAINTIFF'S COUNSEL

TO THE HONORABLE COURT:

Robert M. Meador and Rad Law Firm, counsel for Plaintiff Jon Batts, and pursuant to Local Rule AT-3, file this Motion to Withdraw as Counsel for Plaintiff and state as follows:

1. Plaintiff sued Defendant alleging negligence and strict liability. Defendant removed based on diversity jurisdiction.
2. There is good cause for this Court to grant this Motion to Withdraw. A conflict of interest has developed between Plaintiff and Plaintiff's counsel and ethical considerations require the undersigned to withdraw per the Texas Disciplinary Rules of Professional Conduct.
3. At this time, Plaintiff does not have a successor attorney.
4. Plaintiff's signature does not appear in this Motion per Local Rule AT-3 because Plaintiff has been advised of the filing of this Motion but has not consented to the undersigned's withdrawal.
5. Plaintiff's name, address and telephone number are:

Samuel Jonathan Batts
209 Brookview Drive
Hurst, Texas 76054
(940) 393-6590

6. This Motion to Withdraw is not being sought for delay and should not disrupt the lawsuit. The case is not set for trial until January 2020 and Plaintiff has adequate time to retain other counsel if he wishes to continue to prosecute the case.

WHEREFORE, Robert M. Meador and Rad Law Firm respectfully ask the Court to grant this Motion and allow them to withdraw as Plaintiff's counsel herein.

Respectfully submitted,

RAD LAW FIRM

/s/ Robert M. Meador

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ATTORNEY FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

I hereby certify that on the 7th day of August, 2019, I conferred with counsel for Defendant on the foregoing Motion. Mr. Danekas advised that Defendant does not oppose the Motion.

/s/ Robert M. Meador

Robert M. Meador

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of August, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Steven E. Danekas
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ATTORNEYS FOR DEFENDANT REMINGTON ARMS COMPANY, LLC

/s/ Robert M. Meador

Robert M. Meador